



TOKAI CARBON CB

Building a Future of Technology and Trust

301 Commerce Street, Suite 500
Fort Worth, TX 76102

Long B. Nguyen
Director, Process Safety & Environmental Programs

May 26, 2022

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
1200 Pennsylvania Ave. NW Washington,
D.C. 20460

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Director of Litigation
Litigation Division
MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Division Chief
Environmental Protection Division
MC-066
Office of the Attorney General of Texas
P.O. Box 12548
Austin, TX 78711-2548

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB ("Tokai") hereby provides notice that the Borger Plant Wet Gas Acid ("WSA") scrubber had elevated SO₂ and NO_x emissions relative to their most stringent 7-day limits, for the period of April 25 through May 25, 2022. (Please see attached CEMS data.)

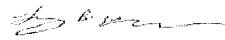
We are continuing to trouble-shoot the process with the vendors to determine why the WSA scrubber is not performing at an optimum level. As stated in the previous notice, Tokai has plans to start a trial where an external heating source will be used instead of the inline duct burner to heat up the flue gas before it enters the WSA scrubber. The trial will commence on May 26th, 2022 and it will last approximately a week.

In addition, Tokai has tentative plans to shut down the WSA scrubber, starting on August 14, 2022, for a thorough inspection of the equipment. Issues found during the inspection will be addressed before the WSA scrubber comes back online.

As we have requested in the past, we would like to implement the alternative limits that are outlined in Provision 18 (Option B and Appendix E) and Provision 27.b.ii. These provisions allow for the collection of emissions data for a certain period, and alternative limits can be set based on the data collected.

Please let me know if you need additional information.

Sincerely,

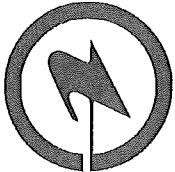
A handwritten signature in black ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen

NOX 7-Day ppmvdc Excess Emission Report

Boiler (EPN-119)

From: 04/25/2022 00:00 **To:** 05/26/2022 05:57 **Facility Name:** Tokai Borger Facility
Generated: 05/26/2022 06:20 **Location:** Borger, TX



Tag Name: U1_NOX_7D_ppmvdc_1D

Total Operating Time: 31.00 Day(s)

No Exclusions Allowed

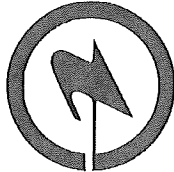
Non-Operating Time: 1.00 Day(s) **Report Time:** 32.00 Day(s)

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	04/25/22 00:00	05/25/22 23:59	31	75	54	103		

Total Operating Time: 31.00 Day(s)
Total Duration (Online only): 31.00 Day(s)
Time in exceedance as a percentage of operating time: 100.00 %
Time in compliance as a percentage of operating time: 0.00 %

SO2 7-Day ppmvdc Excess Emission Report Boiler (EPN-119)

From: 04/25/2022 00:00 To: 05/26/2022 05:57 Facility Name: Tokai Borger Facility
Generated: 05/26/2022 06:21 Location: Borger, TX



Tag Name: U1_SO2_7D_Ppmvdc_1D

Total Operating Time: 31.00 Day(s)

No Exclusions Allowed

Non-Operating Time: 1.00 Day(s) Report Time: 32.00 Day(s)

Inc No	Start Time	End Time	Duration in day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	04/25/22 00:00	05/25/22 23:59	31	154	120	173		

Total Operating Time: 31.00 Day(s)
Total Duration (Online only): 31.00 Day(s)
Time in exceedance as a percentage of operating time: 100.00 %
Time in compliance as a percentage of operating time: 0.00 %